

Exhibit 5

Privacy Policy — Ross University Services Inc. Web Sites

1. General.

Ross University Services Inc. and its related companies or affiliates ("Ross" or "we") respect the privacy of every individual who visits our web sites or responds to our promotions. Ross intends to act reasonably to protect your privacy, but obviously cannot guaranty security against "hackers" or other issues beyond our control. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. This notice applies to all information collected or submitted on Ross web sites, unless otherwise posted.

2. Information Collected From You.

Personally Identifiable Information refers to information that is collected in conjunction with your name. Ross does not collect any personally identifiable information from you unless you provide it voluntarily. If you do not want your personally identifiable information collected, do not submit it to us. Ross may collect other information from you that is not in conjunction with your name. Although most of this information is collected from you when you submit it voluntarily, some of it may be collected automatically by use of a "cookie." Cookies are small text files that reside on your computer and identify you as a unique user. Cookies allow us to, among other things, measure activity on our website and to personalize your experience on our website. For instance, cookies may enable us to remember your viewing preferences without requiring you to re-type a user name and password. Cookies may also allow us to track your status or progress when ordering products from us. If you choose, you can set your browser to reject cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features on our website.

3. How We Use the Information We Collect.

We use the information that we collect to complete a contact or request; to better understand your needs, to provide to Ross marketing, to improve our products and services, and to contact you.

4. Sharing Information That You Provide With Others.

Generally we do not give or sell your information, including your personally identifiable information, with outside companies except in the following situations:

- Blogs and Online Communities. You may choose to submit information as part of a blog or online community offered by Ross. Any information you choose to post, including personally identifiable information, may be available generally to the public, or to other members of the blog or online community.
- Subcontractors. We may share your information with subcontractors that provide us with services. These services may include, among other things, helping to provide services that you request, helping to create or maintain our databases, helping to research and analyze the people who request services or information from us, helping to provide marketing or solicitation materials for our products or services, and/or helping to process payment card information
- Law Enforcement. We may report to law enforcement agencies any activities that we reasonably believe to be unlawful, or that we reasonably believe may aid a law enforcement investigation into unlawful activity. In addition, we reserve the right to release your information to law enforcement agencies if we determine, in our sole judgment, that either you have violated our policies, or the release of your information may protect the rights, property or safety of you or another person.
- Permitted by Law. We may share your information with others as required by, or permitted by, law. This may include sharing your information with governmental entities, or third parties in response to subpoenas, court orders, other legal process, or as we believe is necessary to exercise our legal rights, to defend against legal claims that have been brought against us, or to defend against possible legal claims that we determine in our sole discretion might be brought against us.
- Transfers. In the event that Ross, or substantially all of Ross's assets, are acquired, your Information will be transferred to the acquiring entity. In such a situation, you will be provided with notice that a transfer of your Information is imminent, and you will be given an opportunity to opt-out of the transfer of your information.

5. Children (under age 17).

All persons age 17 or under must ask for and receive their parents' or guardian's permission before sending any information about themselves to us or to anyone online or over the Internet. Parents or guardians of persons age 17 or under must send us an e-mail indicating their approval of the child's participation in any of the services/resources that require collection of personal information on our web sites.

6. Parents/Guardians.

Any information collected by Ross from children is used for the sole purpose of delivering the requested service/materials. If you have a question, or would like to review or delete your child's personally identifiable information, contact us via one of the methods listed at the bottom of this statement. 7) Third-party web sites. Any links to third-party web sites on Ross sites are provided solely as a convenience to you. If you use these links, you will leave the Ross site. Ross does not review all third-party sites, nor

does it control or assume responsibility for the content or privacy policies of any of these sites. Thus, Ross does not endorse or make any representations about them, or any information, or other products or materials found there, or any results that may be obtained from using them. If you decide to access a third-party site linked to a Ross web site, you do so at your own risk.

7. How can you correct your information?

If you have any questions regarding this privacy policy or would like to have your personally identifiable information modified or deleted from our records, please email us or call our toll-free number.

8. How to contact us, and how we may contact you.

Should you have other questions or concerns about this privacy policy, contact us at:

Ross University Services Inc.
630 US Highway 1
North Brunswick, New Jersey 08902
Ross University School of Medicine: 855-MDROSSU (855-637-6778)
Ross University School of Veterinary Medicine: 855-ROSSVET (855-767-7838)
Email Us: webmaster@rossu.edu

If we are required to provide you with notice of a particular event or incident, we will send you that notice by e-mail, telephone, or mail.

9. Do Not Track Signals

Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time we do not modify your experience based upon whether such a signal is broadcast.

10. Behavioral Advertisers

We may participate in behavioral-based advertising. This means that a third party may use technology, such as a cookie on your browser or a web beacon, to identify you on our website so that they can provide advertising about products and services tailored to your interest. That advertising may appear either on our website, or on other websites. If you would like to opt-out of third-party behavioral advertising that collects information on your use of this website, you can do so by visiting the Network Advertising Initiative and the Digital Advertising Alliance.

11. Google Analytics Data

This site uses Google Analytics data that may be examined in concert with data about our ads that have been shown using the Google Display Network or DoubleClick for Advertisers. Anonymous user information is collected by the use of cookies to help us track user interaction with this website after users see our ads and to enable us to optimize our ad campaigns. This site also uses Display Advertising via Google Analytics for Remarketing. Third party vendors, including Google, show our ads on sites on the internet and use cookies to serve ads based on a user's prior visits to this website. We use analytics data to also serve ads based on a user's prior visits to this website. You may opt-out of Google Analytics for Display Advertising, DoubleClick cookie for interest-based advertising or customize Google Display Network ads by using the [Ads Preferences Manager](#).

Last revised on January 10, 2014.